



## **PUBLIC DISCLOSURE**

July 22, 2013

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Mutual FSB, A Fssb  
Charter Number 704519

121 S Ohio Ave  
Sidney, OH 45365-2716

Office of the Comptroller of the Currency

Westlake Center  
4555 Lake Forest Drive, Suite 610  
Cincinnati, OH 45242-3760

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

## **INSTITUTION'S CRA RATING: This institution is rated Outstanding**

The major factors in support of this rating include:

- Reasonable loan-to-deposit ratio;
- Substantial majority of mortgage loans were within the boundaries of the two assessment areas (AAs);
- Excellent borrower income distribution of mortgage loans; and
- Excellent geographic distribution of mortgage loans.

## **SCOPE OF EXAMINATION**

The review period of this examination is July 1, 2007 through June 30, 2013. The evaluation was based on the Small Savings Association Performance Standards. Lending data was evaluated from July 1, 2007 through December 31, 2012. Mutual was rated Satisfactory during the prior CRA evaluation.

## **DESCRIPTION OF INSTITUTION**

Mutual, FSB (Mutual or thrift) is a federally chartered thrift, founded in 1938, with its main office located in downtown Sidney, Ohio. The products and services offered are similar to those offered by other community banks. In addition to the main office, there are three branch offices located in Sidney, Piqua and Troy. Mutual reported total assets of \$112 million at June 30, 2013.

Mutual's loan portfolio consists of a typical variety of loans including residential mortgage loans secured by one-to-four family dwellings. Specifically, mortgage loan products offered include fixed-rate and adjustable-rate, loans for the purchase, refinance, home improvement, construction of one-to-four family dwellings and multi-family dwellings. In addition, commercial, commercial real estate, land and various types of consumer loans are also available.

As of June 30, 2013, the total loan portfolio equaled \$73.7 million representing 66.0 percent of assets. Table 1 on the next page indicates the dollar amount, percentage to total loans and percentage to total assets of each loan category. Residential mortgages as a percent of outstanding loans have increased from 45.1 percent to 52.9 percent since the November 2007 CRA evaluation. For the same timeframe, nonresidential mortgages as a percent of outstanding loans have increased from 17.5 percent to 21.3 percent, while consumer loans as a percent of outstanding loans have decreased from 32.7 percent to 10.5 percent. Commercial non-mortgages have increased from 14.7 percent to 15.4 percent.

<b>Table 1 - Mutual FSB's Investment in Loans</b>			
<b>(06/30/2013)</b>			
<b>Loan Category</b>	<b>Amount (\$000's)</b>	<b>Percent of Total Loans</b>	<b>Percent of Total Assets</b>
Residential Mortgage	\$38,959	53%	35%
Nonresidential Mortgage	\$15,714	21%	14%
Commercial Nonmortgage	\$11,362	15%	10%
Consumer	\$7,713	11%	7%
Total	\$73,748	100.0%	66%

Source: 6/30/2013 UBPR

Mutual also offers a full range of insured deposit products consisting of passbook savings, certificate of deposits, checking accounts and individual retirement accounts. In addition, they offer internet banking, automated teller machine and safe deposit box services. We did not identify any factors pertaining to Mutual's financial condition, size or product offerings that would limit its ability to help meet the credit needs of its AAs.

## **DESCRIPTION OF ASSESSMENT AREAS**

Mutual has two AAs: one is Shelby County, which is not located in a Metropolitan Statistical Area (MSA), and the other one is Miami County, which is located in the Dayton, Ohio MSA. Because Mutual operates in both a Non-MSA and a MSA, we are required by the Act to determine compliance by analyzing performance separately in both areas. Below, we described the bank's operations and performance in its Non-MSA AA (Shelby County) and in its MSA AA (Miami County). Two branches are located in the Non-MSA AA and two branches are located in the MSA AA, so we gave equal weighting to performance in the two AAs. No branches have been opened or closed since the previous evaluation. In addition to walk-in business, Mutual also relies heavily on referrals or repeat business of existing borrowers. Advertising is limited to traditional forms such as print, radio, TV, internet and word of mouth. Substantively all products and services are available in both branch locations.

### **Shelby County AA (Non-MSA)**

Mutual maintains two full service branch offices in Sidney, in Shelby County, Ohio, which is not located in a MSA. Both offices maintain drive-up services and one office contains an ATM machine. Operating hours maintained are similar to those of community banks. The branches serve as the focal point for lending operations in Shelby County. According to the 2010 census, both branches are located in middle-income census tracts; per the 2000 census, one of the branches was located in an upper-income census tract. No branches have been opened or closed since the previous CRA evaluation.

The Shelby County AA is a blend of agriculture and industry. The manufacturing base is well diversified; the primary products are aluminum, plastics and food. As with most of the state, Shelby County experienced a significant increase in unemployment during the financial crisis, but has since recovered and currently compares favorably with the State. For instance, the July 2013 unemployment rate was 6.0 percent, while the statewide unemployment rate was 7.3 percent. The five largest employers in Shelby County are Emerson Climate Technologies, Freshway, Honda of America, NK Parts Industries and Plastipak Packaging. The County includes eight incorporated villages (Anna, Botkins, Fort Loramie, Kettlersville, Lockington, Port Jefferson, Jackson Center and Russia) and one city (Sidney). Per the 2010 Census, Shelby County is rural with a total population of 49,423. Shelby County has grown by 1.0 percent since the 2000 census; similar to the State of Ohio, which has grown by 1.1 percent since the 2000 census. The population of Sidney has grown to 21,229. All other towns and villages in the County have populations under 2,000.

Table 3 illustrates demographic data on population, families, and housing units within the Shelby County AA per the 2000 census. The data remained relatively stable between 2000 and 2010, with the exception of the vacant housing units percentage, which increased to 8.0 percent. From this point forward, unless indicated otherwise, all tabular data reflects 2000 census information.

<b>Table 3 - Demographic Data (Based on 2000 U.S. Census Data)</b>	
<b>Demographic Data</b>	<b>2000 Census</b>
Population	47,910
Total Families	13,164
1-4 Family Units	17,584
Multi-family Units	1,098
% Owner-Occupied Units	70%
% Rental-Occupied Units	24%
% Vacant Housing Units	6%
Weighted Average Median Housing	\$99,332

Table 4 indicates the number of geographies in each income level and compares it to the distribution of families living in those geographies and to one-to-four family dwellings located within those geographies. Note: All tabular demographic information throughout this report reflect updated U.S. census data resulting from the 2004 MSA boundary changes implemented by the Office of Management and Budget (OMB).

<b>Table 4 - Distribution of Geographies, Families and Housing Units In the Shelby County AA</b>						
<b>Geog Inc Level</b>	<b>Geographies</b>		<b>Total Area Families</b>		<b>1-4 Family Dwellings</b>	
<b>2000 Census:</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%
Middle	4	40.0%	5,199	39.5%	7,309	41.6%
Upper	6	60.0%	7,965	60.5%	10,275	58.4%
Total	10	100.0%	13,164	100.0%	17,584	100.0%

Source: 2000 U.S. Census

The 2010 census resulted in the division of Shelby County into 10 census tracts, none of which are low-income; however, one is now moderate-income. The one moderate-income census tract contains 12 percent of total area families and 11 percent of the one-to-four family dwellings.

Table 5(a) below indicates the median family income ranges of each income category based on the Department of HUD annual adjustments; table 5(b) reflects the updated HUD median family income for each year during the review period; and table 5(c) shows the distribution of families in each income range of the AA.

According to 2000 census data, 11.7 percent of the families in the Shelby County AA are classified as low-income with 7 percent of the families reported as below the poverty level. According to the 2010 census, the Shelby County poverty rate increased to 11 percent. The Shelby County poverty rate is significant, but still below the statewide poverty rate of 14.8 percent (estimated at April 1, 2012 by U. S. Census Bureau, American Community Survey). The poverty rate significantly impacts the number of qualified borrowers in the low-income category.

<b>Table 5(a) - Median Family Income Ranges (*)</b>		
<b>Income Category (As % of MSA Median)</b>	<b>Income Ranges</b>	
	<b>From</b>	<b>To</b>
Low (< 50%)	\$1	\$26,449
Moderate (50% - 79%)	\$26,450	\$42,319
Middle (80% - 119%)	\$42,320	\$63,479
Upper (>= 120%)	\$63,480	+

\* Based on 2011 HUD Median Family Income of the Non-MSA AA

<b>Table 5(b) - Annual HUD Median Family Income</b>	
<b>Year</b>	<b>Amount</b>
2007	\$50,000
2008	\$51,600
2009	\$53,800
2010	\$53,700
2011	\$52,900

<b>Table 5(c) - Distribution of Families In the Shelby County AA</b>		
<b>Family Income Category (As a % of MSA Median)</b>	<b>2000 Census Data</b>	
	<b>Number</b>	<b>Percent</b>
Low (< 50%)	1,537	11.7%
Moderate (50% - 79%)	1,977	15.0%
Middle (80% - 119%)	3,255	24.7%
Upper (>= 120%)	6,395	48.6%
Total	13,164	100.0%

Source: 2000 U.S. Census

**Miami County AA (Dayton, Ohio MSA)**

Mutual maintains two banking offices in Miami County, Ohio, which is part of the Dayton, OH MSA. One office is in Troy, the Miami County seat, and the other office is in Piqua, a community located in northern Miami County, about half way between Troy and the main office in Sidney. Per the 2010 census, the Piqua branch is located in a moderate-income census tract, while the Troy branch is in a middle-income census tract. Both branches were in middle-income census tracts per the 2000 census. Table 8 illustrates demographic data on population, families, and housing units in Miami County.

<b>Table 8 - Demographic Data (Based on 2000 U.S. Census Data)</b>	
<b>Demographic Data</b>	<b>2000 Census</b>
Population	98,868
Total Families	28,158
1-4 Family Units	37,938
Multi-family Units	2,616
% Owner-Occupied Units	69%
% Rental-Occupied Units	26%
% Vacant Housing Units	5%
Weighted Average Median Housing	\$113,544

Per the 2010 census, the data above has remained relatively constant with the exception of the weighted average median housing cost, which increased to \$138,929.

In spite of being designated as a part of the Dayton MSA, Miami County is still partially rural, but is slowly suburbanizing due to the expansion of metropolitan Dayton. The U.S. Census Bureau estimates the population at 102,506 per the 2010 census. This represents slow population growth since the 2000 census. The population of Troy has grown to 25,236, while Piqua has grown to 20,522. All other towns and villages in the County have populations under 10,000.

Miami County unemployment levels are similar to the statewide rate; the July 2013 unemployment rate was 7.2 percent, while the statewide unemployment rate was 7.3 percent. Major employers include AO Smith Corporation, Con-Agra, Crane Company, F-tech Inc/F&P America, and Goodrich. In addition, many area residents commute to Dayton for employment.

Table 9 indicates the number of geographies in each income level and compares it to the distribution of families living in those geographies and to one-to-four family dwellings located within those geographies. The Miami County AA contained 20 geographies including three moderate-income geographies. No geographies are low-income.

Table 9 - Distribution of Geographies, Families and Housing Units In the Miami County AA						
Geog Inc Level	Geographies		Total Area Families		1-4 Family Dwellings	
2000 Census:	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	0	0.0%
Moderate	3	15.0%	4,227	15.0%	6,450	17.4%
Middle	14	70.0%	19,033	67.6%	24,685	66.4%
Upper	3	15.0%	4,898	17.4%	6,014	16.2%
Total	20	100.0%	28,158	100.0%	37,149	100.0%

Per the 2010 census, Miami County was divided into 21 census tracts with no low-income, 4 moderate-income, 14 middle-income and 3 upper-income.

Table 10(a) indicates the median family income ranges of each income category based on the 2011 HUD adjustment; table 10(b) reflects the updated HUD median family income for each year during the review period; and table 10(c) shows the distribution of families in each income range of the AA.

Table 10(a) - Median Family Income Ranges (*)		
Income Category (As % of MSA Median)	Income Ranges	
	From	To
Low (< 50%)	\$1	\$31,199
Moderate (50% - 79%)	\$31,200	\$49,919
Middle (80% - 119%)	\$49,920	\$74,879
Upper (>= 120%)	\$74,880	+

\* Based on HUD 2011 Median Family Income of the MSA

Table 10(b) - Annual HUD Median Family Income	
Year	Amount
2007	\$58,700
2008	\$59,800
2009	\$62,100
2010	\$61,700
2011	\$62,400

Table 10(c)- Distribution of Families In the Miami County AA		
Family Income Category (As a % of MSA Median)	2000 Census Data	
	Number	Percent
Low (< 50%)	4,794	17.0%
Moderate (50% - 79%)	5,566	19.8%
Middle (80% - 119%)	7,052	25.0%
Upper (>= 120%)	10,746	38.2%
Total	28,158	100.0%

Source: U.S. Census

According to 2000 census data, 17.0 percent of the families in the AA are classified as low-income, with 7 percent of the families reporting income below the poverty level. Based on the 2010 census, the percentage of low-income residents remained relatively stable at 17.3 percent, while the poverty rate increased to 9 percent, still well below the statewide poverty rate of 14.8 percent (estimated at April 1, 2012 by U. S. Census Bureau, American Community Survey). The poverty rate significantly impacts the number of qualified borrowers in the low-income category.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Based on the criteria for the CRA lending test, Mutual’s lending performance is outstanding.

### Loan-to-Deposit (LTD) Ratio

Mutual’s LTD meets the standards for satisfactory performance. Mutual’s LTD ratio during the review period ranged from a high of 116.6 percent at September 30, 2008 to a low of 62.0 percent at September 30, 2012. The review period covered from the previous CRA exam at September 30, 2007 to June 30, 2013. The average LTD ratio for this period was 90.8 percent and is in line with the LTD ratio of its peer group (similar sized west central Ohio banks and thrifts), which was 90.3 percent at June 30, 2013. The LTD ratio is indicative of Mutual’s commitment to lending.

### Lending in Assessment Areas

Mutual’s lending activities inside the AAs exceeds the standards for satisfactory performance. One of the four rating criteria for a small bank is the percentage of lending activities inside the AA. Table 2 demonstrates that the vast majority of Mutual’s Home Mortgage Disclosure Act (HMDA) reportable mortgage loans have been inside the combined AAs.

Table 2- Concentration of Residential Mortgage Loans *					
7/1/2007 – 12/31/2012					
(Dollars in thousands)					
Period By Year	In AAs		Outside AAs		Total HMDA Loans
	#	%	#	%	#
By Number:					
07/01/07 – 12/31/11	246	89.1%	30	10.9%	276
2012	53	94.6%	3	5.4%	56
Total	299	90.1%	33	9.9%	332
By \$ Amount:	\$ Amt	%	\$ Amt	%	\$ Amt
07/01/07 – 12/31/11	15,961	89.4%	1,891	10.6%	17,852
2012	3,438	94.9%	186	5.1%	3,624
Total	19,399	90.3%	2,077	9.7%	21,476

\* Percentages are based on total loans originated during applicable periods based on annual HMDA filings

Mutual’s mortgage market share is 2.7 percent in 2011, ranking 11<sup>th</sup> in Shelby County, while the deposit market share, as published by the FDIC, was 8.2 percent at June 30, 2011, ranking 4<sup>th</sup>. In Miami County, mortgage market share is 0.5 percent in 2011, ranking 30<sup>th</sup>, while the deposit market share, as published by the FDIC, was 2.9 percent at June 30, 2011, ranking 11<sup>th</sup>. We note most mortgage competitors in both AAs are much larger institutions with greater resources.

**Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

**Lending to Borrowers of Different Incomes-Shelby County**

The overall borrower income distribution of home mortgage loans exceeds the standards for satisfactory performance. The bank’s borrower income distribution of HMDA loans during July 1, 2007 through 2011 is excellent. Table 6 illustrates loan originations in the Shelby County AA, categorized by borrower income level, that were reported by Mutual during the review period (except 2012) and compares this activity to the 2011 aggregate HMDA data reported by other HMDA reporting financial institutions, the most recent aggregate data available.

<b>Table 6 - Distribution of HMDA-Reportable Loans By Borrower Income Level in Non-MSA AA (Dollars in thousands)</b>			
<b>Borrower Inc. Level</b>	<b>Review Period</b>		<b>Aggregate</b>
	<b>7/1/2007 – 12/31/2011</b>		<b>2011</b>
<b>By Number:</b>	<b>#</b>	<b>%</b>	<b>% by #</b>
Low	8	4.9%	5.3%
Moderate	51	30.9%	17.8%
Middle	39	23.6%	21.4%
Upper	67	40.6%	43.4%
NA	0	0.0%	12.1%
Total	165	100.0%	100.0%
<b>By \$ Amt:</b>	<b>\$</b>	<b>%</b>	<b>% by \$</b>
Low	392	3.5%	2.7%
Moderate	2,401	21.5%	12.6%
Middle	2,427	21.8%	18.2%
Upper	5,930	53.2%	52.6%
NA	0	0.0%	13.9%
Total	\$11,150	100.0%	100.0%

Source: Mutual HMDA Records and Public HMDA Data

Table 6 demonstrates Mutual’s distribution of mortgage lending to low-income borrowers is very similar to that of other active mortgage lenders in the area. Mutual’s borrower distribution to moderate-income borrowers is superior to that of other HMDA reporting mortgage lenders in the area. Mutual’s lending data also compares favorably to the demographic information contained in Table 5c above, after consideration of the poverty rate.

The distribution of HMDA lending data based on borrower income in 2012 was consistent with the performance noted from July 1, 2007 through 2011.

**Lending to Borrowers of Different Incomes-Miami County**

The overall borrower income distribution of home mortgage loans exceeds the standards for satisfactory performance. The bank’s borrower income distribution of HMDA loans during July 1, 2007 through 2011 is excellent.

Table 11 illustrates loan originations in the Miami County AA categorized by borrower income level that were reported by Mutual during the review period (except 2012) and compares this activity to the 2011 aggregate data, which is comprised of all HMDA reporting financial institutions and is the most recent aggregate data available. The data reflects the percentage of mortgage lending to low-income consumers is higher than the percentage of low-income lending demonstrated by the aggregate data. Similarly, the percentage of mortgage lending to moderate-income consumers is also significantly higher than the aggregate. This reflects excellent performance under this rating criterion, particularly when considering the population of residents who qualify as low-income and the poverty level that further reduces the pool of potential mortgage borrowers who are low-income. Performance regarding moderate-income borrowers is also excellent compared to either the aggregate or the population of residents who are moderate-income.

<b>Table 11 - Distribution of HMDA-Reportable Loans By Borrower Income Level in MSA AA (Dollars in thousands)</b>			
<b>Borrower Inc. Level</b>	<b>Review Period 7/1/2007 – 12/31/2011</b>		<b>Aggregate 2011</b>
<b>By Number:</b>	<b>#</b>	<b>%</b>	<b>% by #</b>
Low	9	11.1%	9.7%
Moderate	26	32.1%	18.9%
Middle	25	30.9%	23.1%
Upper	21	25.9%	37.3%
NA	0	0.0%	11.0%
Total	81	100.0%	100.0%
<b>By \$ Amt:</b>	<b>\$</b>	<b>%</b>	<b>% by \$</b>
Low	318	6.6%	5.3%
Moderate	1,244	25.8%	14.1%
Middle	1,595	33.2%	21.1%
Upper	1,654	34.4%	47.5%
NA	0	0.0%	12.0%
Total	\$4,811	100.0%	100.0%

Source: Mutual HMDA Records and Public HMDA Data

The distribution of HMDA lending data based on borrower income in 2012 was superior to the performance noted from July 1, 2007 through 2011. In 2012, 21 percent of mortgage loans granted were to low-income borrowers, while 50 percent were to moderate-income borrowers.

**Geographic Distribution of Loans**

**Geographic Distribution of Loans – Shelby County**

The overall geographic distribution of home mortgage loans meets the standards for satisfactory performance. The bank’s geographic income distribution of HMDA loans during July 1, 2007 through 2011 is good. Table 7 illustrates loan originations in the Shelby County AA categorized by geography income level reported by Mutual during each year of the review period and compares this activity to the 2011 aggregate HMDA data reported by other financial institutions, which is the most recent aggregate data available.

<b>Table 7 - Distribution of HMDA-Reportable Loans By Geography Income Level in Non-MSA AA (Dollars in thousands)</b>			
<b>Borrower Inc. Level</b>	<b>Review Period 7/1/2007 – 12/31/2011</b>		<b>Aggregate 2011</b>
	<b>#</b>	<b>%</b>	<b>% by #</b>
<b>By Number:</b>			
Middle	80	48.5%	28.8%
Upper	85	51.5%	69.9%
NA	0	0.0%	1.3%
Total	165	100.0%	100.0%
<b>By \$ Amt:</b>	<b>\$</b>	<b>%</b>	<b>% by \$</b>
Middle	4,291	38.5%	23.0%
Upper	6,859	61.5%	75.4%
NA	0	0.0%	1.6%
Total	\$11,150	100.0%	100.0%

Source: Mutual HMDA Records and Public HMDA Data

There are no low- or moderate-income geographies in Shelby County per the 2000 census. Table 7 demonstrates Mutual originated a higher percentage of its loans in middle-income geographies than its competitors.

Mutual’s 2012 performance is compared to the 2010 census, which included a re-designation of one tract as moderate-income. Mutual’s 2012 performance compared to the demographics in that one census tract was good, as the percentage of its loans in that moderate-income census tract was only slightly less than the percentage of owner-occupied housing units located in that same census tract. The distribution of HMDA lending data based on borrower income in 2012 was consistent with the performance noted from July 1, 2007 through 2011.

**Geographic Distribution of Loans – Miami County**

The overall geographic income distribution of home mortgage loans exceeds the standards for satisfactory performance. The bank’s geographic income distribution of HMDA loans during July 1, 2007 through 2011 is excellent.

Table 12 illustrates loan originations in the Miami County AA categorized by geographic income level reported by Mutual during the review period (except 2012) and compares this activity to the 2011 aggregate HMDA data reported by other financial institutions, which is the most recent aggregate data available.

<b>Table 12 - Distribution of HMDA-Reportable Loans By Geography Income Level in MSA AA (Dollars in thousands)</b>			
<b>Borrower Inc. Level</b>	<b>Review Period 7/1/2007 – 12/31/2011</b>		<b>Aggregate 2011</b>
<b>By Number:</b>	<b>#</b>	<b>%</b>	<b>% by #</b>
Moderate	34	42.0%	9.1%
Middle	37	45.7%	66.8%
Upper	10	12.3%	24.1%
NA	0	0.0%	0.0%
Total	81	100.0%	100.0%
<b>By \$ Amt:</b>	<b>\$</b>	<b>%</b>	<b>% by \$</b>
Moderate	1,294	26.9%	5.4%
Middle	2,913	60.6%	66.1%
Upper	604	12.5%	28.5%
NA	0	0.0%	0.0%
Total	\$4,811	100.0%	100.0%

Source: Mutual HMDA Records and Public HMDA Data

In addition, we observed a large number of loans in the moderate-income census tract are secured by non-owner occupied properties. However, we determined even when only considering loans in the moderate-income tracts that are secured by owner-occupied properties, Mutual's percentage of such loans in moderate-income tracts was strong. From July 1, 2007 through December 31, 2011, we determined 55 loans reported by Mutual in Miami County were secured by owner-occupied properties; 20 of these loans (or 36 percent) were located in moderate-income census tracts.

The distribution of HMDA lending data based on geography income in 2012 was consistent with the performance noted from July 1, 2007 through 2011.

### **Responses to Complaints**

During the review period, Mutual received no known written complaints relating to its performance in helping to meet the credit needs of its AAs.

### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Pursuant to 12 C.F.R. 25.28(c), in determining a national thrift's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the thrift, or in any AA by an affiliate whose loans have been considered as part of the thrift's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.